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February 8, 2018

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Re: NOTICE OF EX PARTE PRESENTATION**

**CG Docket No. 17-59: *Advancing Methods to Target and Eliminate Unlawful Robocalls.***

Ms. Dortch:

On February 6, 2018, Mike Keegan, CEO; David Kaemmer, Vice President of Sales; and Paul Florack, Vice President of Product, all with Transaction Network Services, Inc. (“TNS”)<sup>1</sup> and Jason Torrey, General Manager, Cequent, Inc. (“Cequent”)<sup>2</sup> met with FCC Chairman Ajit Pai, and Zenji Nakazawa, Legal Advisor, Public Safety and Consumer Protection, Office of Chairman Pai. At our meeting TNS presented and provided the Chairman’s Office with the attached PowerPoint presentation, which summarizes the items discussed. We generally discussed the relative merits of robocall solutions and TNS’ Call Guardian robocall solution, and the Comments of TNS filed on January 23, 2018 in CG Docket No. 17-59.<sup>3</sup>

TNS discussed its Call Guardian solution for identifying and protecting consumers from robocallers, as described in the attached presentation. Call Guardian leverages TNS’ unique position as a telecom services routing and signaling provider to more than 400 wireless and wireline operators to identify unwanted robocalls and other bad actors in real time through big data analysis of over 1 Billion call events daily. Call Guardian’s advanced algorithm assigns reputational scores for more than 1 billion unique telephone numbers that originate calls – both assigned and unassigned numbers across all carrier market segments – and adjusts those scores in

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<sup>1</sup> TNS is a leading global provider of data communications and interoperability solutions. TNS offers a broad range of network connectivity and innovative value-added services which enable transactions and the exchange of information in diverse industries such as telecommunications, payment processing, and financial services markets.

<sup>2</sup> Cequent, which is a wholly-owned subsidiary of TNS, has pioneered the development of innovative, market-leading mobile Enhanced Caller ID and Call Management solutions.

<sup>3</sup> *Advancing Methods to Target and Eliminate Unlawful Robocalls*, Notice of Proposed Rulemaking and Notice of Inquiry, CG Docket No. 17-59, FCC 17-24 (CBG 2017) (“NPRM”).

real time depending on the frequency, patterns, source, and other attributes. Call Guardian does not, however, permanently relegate a customer with a spoofed number to a “black list;” when a negative pattern stops, the reputational score is restored and again functions normally. TNS offers Call Guardian services directly to wireline operators and to wireless operators through Cequent as a part of its caller identification and call management services portfolio, deployed in partnership with many mobile network operators.

TNS specifically provided the following input regarding its Call Guardian solution during our meeting:

- TNS has been in the business of developing large scale cross carrier industry solutions for over 20 years including systems to support Local Number Portability, Toll Free Portability, LTE roaming exchanges, and VoLTE interworking.
- TNS has built a carrier centric nuisance call management system that can adjust to bad actor calling techniques while allowing the consumer to dictate how such calls are handled (e.g. completed with more information about the intent of the caller, diverted to IVR, or blocked). This includes the unique ability to flag calls as spoofed in advance of (and in the future in conjunction with) STIR/SHAKEN.
- Such solutions require real time data analytics across multiple carriers and dispute resolution capabilities with real time insight into why a Telephone Number may be scored and categorized a certain way. The TNS Call Guardian portal is accessible to both carriers and vetted call originators.
- The TNS solution is applicable to both Wireless and Broadband service providers, and has been deployed at three of five largest wireless service providers.

During our meeting TNS also summarized its previously filed Comments to the FCC Report & Order as outlined in the attached presentation. TNS emphasized that while the use of invalid and unallocated number spoofing is on the rise, it only constitutes a small percentage of the nuisance calling problem. TNS expressed concern that the implementation of systems that block invalid or unallocated numbers with drive bad actors to increase spoofing of assigned numbers. Consequently, TNS suggested that more clarity will be required on blocking/tagging assigned numbers that have been identified as spoofed or likely spam, and that real-time data analytics will be required before, during, and after deployment of longer term standards like STIR/SHAKEN. Relative to reporting requirements, TNS stressed that it was premature to mandate reporting on solution effectiveness and that third parties like TNS could provide insights in this area in the meantime.

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission’s Rules. Please do not hesitate to contact me with any questions or concerns.

Sincerely,



Michael R. McCarthy  
SVP, Assistant General Counsel

attachment

cc (via email): Mr. Zenji Nakazawa, Legal Advisor,  
Public Safety and Consumer  
Protection

One Connection - A World of Opportunities



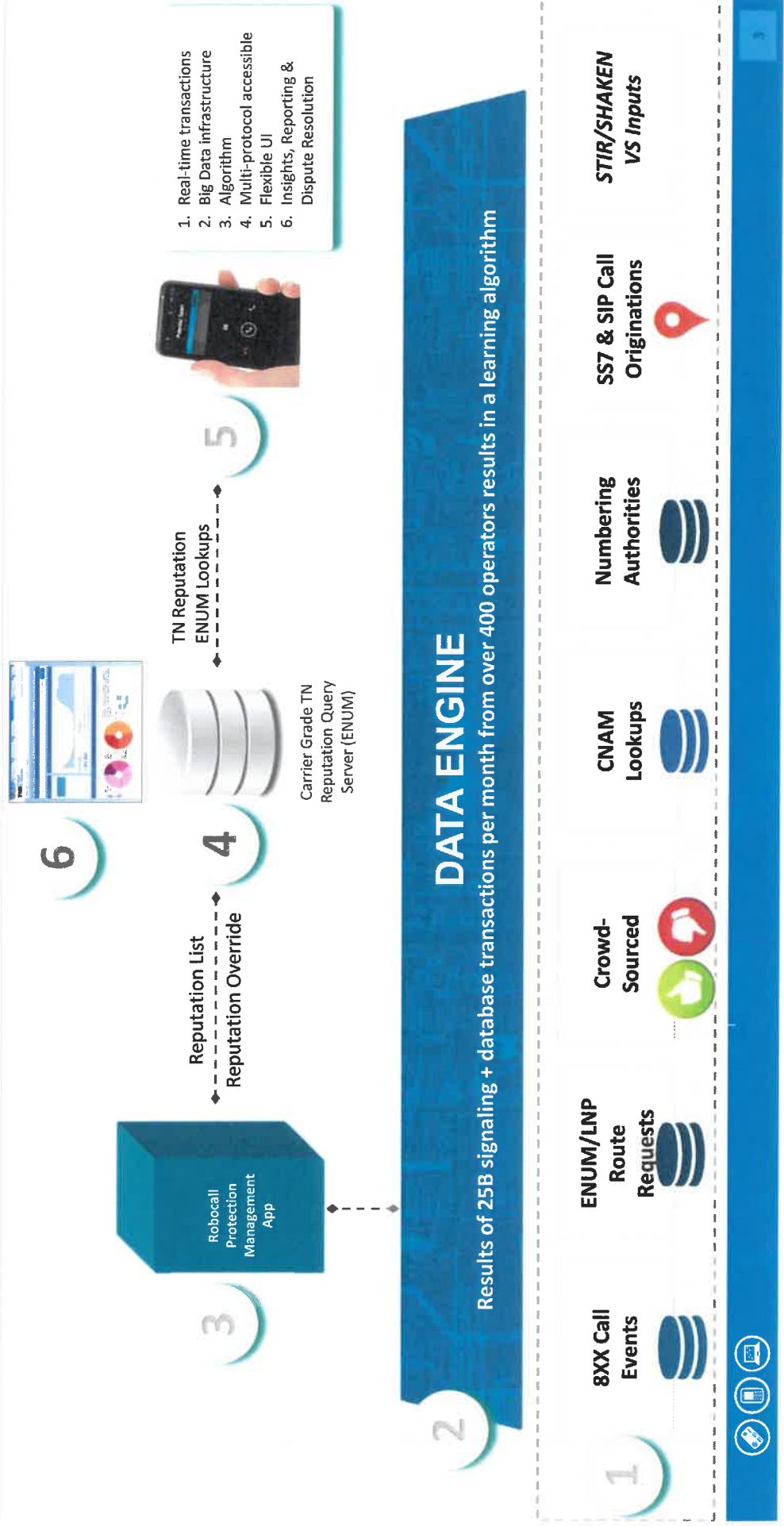
# TNS Comments to CG Docket 17-59

Advanced Methods to Target and Eliminate Unlawful Robocalls



- TNS' unique position in the industry as the largest independent inter-carrier signaling, call routing, and end point discovery provider gives it unequalled insight into the nuisance caller problem
  - Analyze over **1 Billion call events daily across over 400 operators** (largest to smallest across all segments)
  - Call event data is **processed in seconds**, allowing for detection of per call spoofing (e.g. Neighbor Spoofing)
  - Insights and reporting provides operators with **tools to address dispute resolution** and manage call filtering services
  - TNS solutions are **carrier driven, protecting consumer privacy and carrier policies**
- These insights and capabilities, combined with innovative mobile client applications, are why TNS robocall solutions have been deployed at **3 of the top 5 wireless service provider networks**

# TNS Call Guardian: Carrier Provided Service for Wireless and Broadband Networks

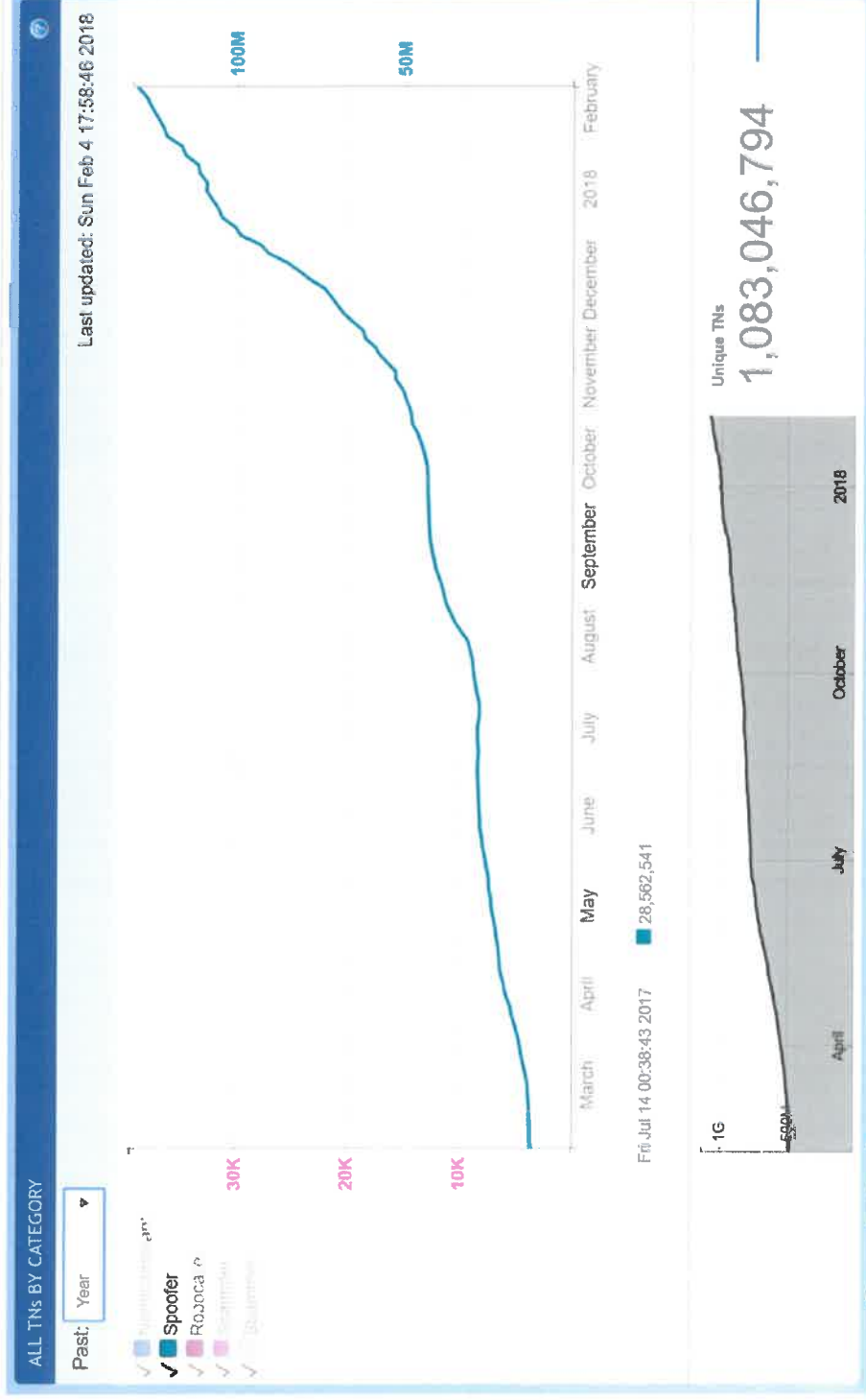


1. Real-time transactions
2. Big Data infrastructure
3. Algorithm
4. Multi-protocol accessible
5. Flexible UI
6. Insights, Reporting & Dispute Resolution

## TNS Comments Summary

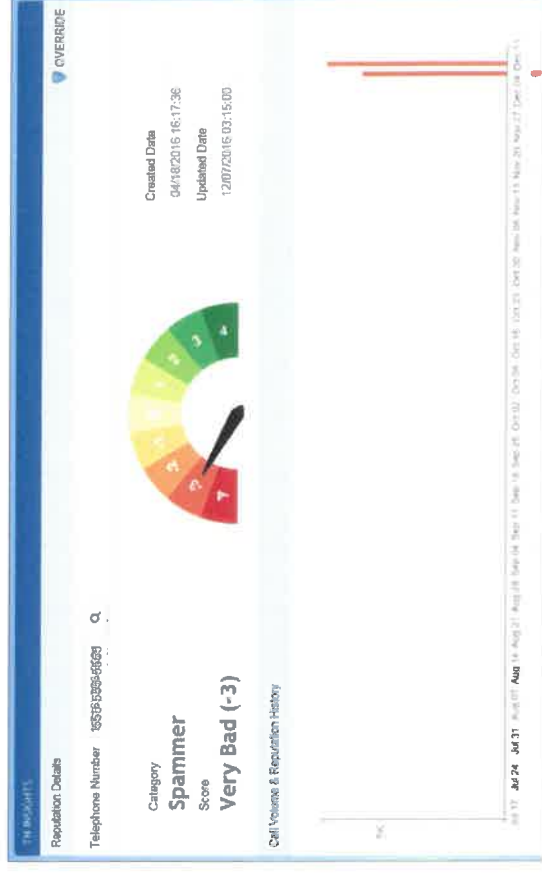
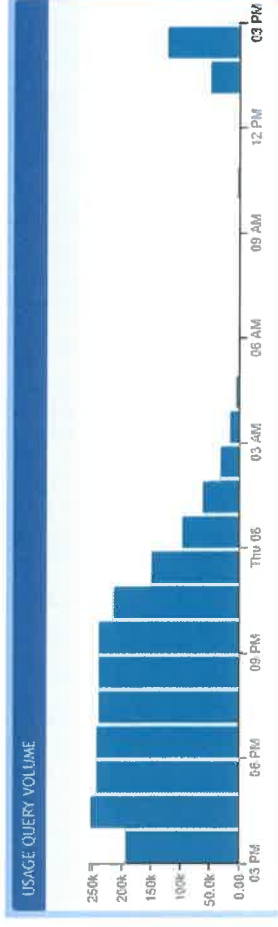
- FCC Report & Order Comments:
  - Use of Invalid & Unallocated Number spoofing, while on the rise, is a small percentage of the nuisance calling problem
    - Allocated, unassigned numbers more difficult to track today
  - Implementation of systems that block such numbers will drive bad actors to use assigned numbers
    - More clarity required on blocking/tagging assigned numbers that have been identified as spoofed or likely scam, and safe harbor in general
    - Carrier enabled dispute resolution capabilities required
  - Real time data analytics will be required before, during, and after deployment of longer term standards like STIR/SHAKEN
  - Premature to mandate carrier reporting while solutions are being deployed and blocking uncertainties exist
    - Third parties like TNS can provide industry insights without burdening operators or providing bad actors with roadmap for next approach

# Unique Invalid and Unallocated Numbers





# Insights :: Robust Portal, Reporting, Dispute Resolution



Leveraging the Call Guardian Insights and Reporting Portal provides accurate data of call events, real time scoring decisions, and reporting capabilities



# Thank You



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